

# EXHIBIT 1

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June 10, 2016

VIA E-MAIL

Laura A. Menninger, Esq.  
HADDON, MORGAN AND FOREMAN, P.C.  
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Denver, Colorado 80203  
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Re: *Giuffre v. Maxwell*  
Case No. 15-cv-07433-RWS

Dear Ms. Menninger:

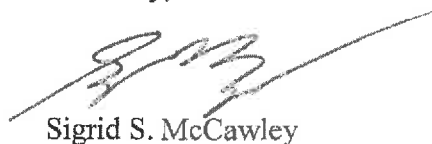
On behalf of the Plaintiff, Virginia Giuffre, documents, Bates-stamped GIUFFRE005607 through GIUFFRE005613, are being produced pursuant to Defendant's Request for Production. Certain of the documents within this production have been designated as CONFIDENTIAL in accordance with your proposed Protective Order. Please treat these documents accordingly.

This production consists solely of all data that is responsive to Defendant's various requests for production from Ms. Giuffre's iCloud account.

Attached to this letter, please also find an updated privilege log.

If you have any questions concerning the foregoing, or if there are any issues with the media, please do not hesitate to contact me at (954) 356-0011.

Sincerely,



Sigrid S. McCawley

SSM:dk  
Enclosures